

Materials.¹ The transcripts made available to each will mask only that material that is protected by *another* present or former plaintiff's *individual* attorney-client or work-product privilege. My planned redactions of any material as to which the *recipient* holds a privilege (alone or jointly with other present or former plaintiffs) will be marked with transparent redaction boxes, but not masked. The recipients will be given until Monday, April 6, 2020 to propose any further redactions or challenge the redactions presented to them. After considering any such suggestions, I will make the transcripts available – masking *all* work product and attorney-client privileged communications that have not been waived or forfeited – to Defendants.

I remind all concerned that the privilege or confidentiality judgments made throughout this review process should be considered tentative, not final, as discussed in the February 6 Memorandum.

March 12, 2020

/s/ William T. Hangle

WILLIAM T. HANGLEY

SPECIAL DISCOVERY MASTER

¹ Each unique set of these Hearing Materials will be placed on a password-protected ShareFile link; the password will be emailed only to appropriate individual or her counsel, *as well as to counsel for Hagens Berman, Mr. Weaver, and Ms. Reeves.*